

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No. 05-263
FM Broadcast Stations)	RM-11269
(Grants and Church Rock, New Mexico))	

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To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

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Federal Communications Commission
Office of Secretary

REPLY COMMENTS AND ERRATA

College Creek Broadcasting, LLC, Marathon Media Group, LLC, and Sky Media, LLC (together, the "Joint Parties"), by their counsel, hereby submit these Reply Comments and Errata. On October 17, 2005, the Joint Parties submitted a counterproposal in the above captioned proceeding. After reviewing their counterproposal, the Joint Parties noticed the following typographical errors:

1. On Table 1 of the engineering statement, the entry for Pioche, NV should be deleted.
2. On Exhibit E, Figure 7 of the engineering statement, the reference to, and contour for, KLGL.C should be deleted. A new Exhibit E, Figure 7 is attached hereto as Attachment 1.

The Joint Parties also desire to modify the reference coordinates at Indian Springs, Nevada, and Monroe, Utah.¹ At Indian Springs the reference coordinates for Channel 266C should be changed from: 36-37-15 North Latitude, 115-57-31 West Longitude, to: 36-37-24 North Latitude, 115-58-19 West Longitude. Attached hereto as Attachment 2 are the following

¹ These changes in coordinates are not requested to correct any deficiency. They are being requested for a preferred site location.

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replacement figures for the Channel 266C allotment at Indian Springs that reflect the new reference coordinates:

- Exhibit E, Figure 14 Allocation Study for Channel 266C, KPLD, Indian Springs, NV
- Exhibit E, Figure 15 KPLD, Indian Springs, NV 70 dBu Contour Map
- Exhibit E, Figure 16 KPLD, Indian Springs, NV Gain and Loss Area Map

At Monroe the reference coordinates for Channel 271C should be changed from: 38-26-23 North Latitude, 112-20-36 West Longitude, to: 38-23-10 North Latitude, 112-19-47 West Longitude. Attached hereto as Attachment 3 are the following replacement figures for the Channel 271C allotment at Monroe that reflect the new reference coordinates:

- Exhibit E, Figure 8 Allocation Study for Channel 271C, Monroe, UT
- Exhibit E, Figure 9 Ch 271C Monroe, UT, 70 dBu Contour Map
- Exhibit E, Figure 10 Ch 271C Monroe, UT, Gain and Loss Area Map
- Exhibit E, Figure 11 Ch 271C Monroe, UT, Remaining Services Study

Finally, the Joint Parties' engineers have discovered a technical solution that will eliminate the conflict with the Petitioner's proposal to allot Channel 279C at Church Rock, New Mexico. In discussions with the Petitioner's engineering consultants, the Joint Parties learned that the Petitioner was looking for an alternate channel at Teec Nos Pos, Arizona in order to eliminate the conflict with the Joint Parties' proposal. After this conversation, the Joint Parties engineers also began looking for an alternate channel in order to accommodate the Petitioner's

proposal. The Joint Parties have determined that Channel 293C1 can be allotted at Fredonia.² As a result of this alternate channel at Fredonia, changes are no longer required for the vacant allotment at First Mesa, Arizona and thus, no changes are necessary for College Creek's permit at Teec Nos Pos, Arizona. Therefore, there is no longer a conflict with the Petitioner's proposal to allot Channel 279C at Church Rock, New Mexico.

WHEREFORE, the Joint Parties respectfully request that the Commission accept the above referenced corrections and modifications to the Joint Parties' Counterproposal. In addition, the Joint Parties request that the Commission modify the Joint Parties' Counterproposal to (i) allot Channel 293C1 at Fredonia (instead of Channel 247C1), (ii) remove the proposal to allot Channel 237C at First Mesa, Arizona, and (iii) remove the proposal to allot Channel 278C2 at Teec Nos Pos, Arizona. These modifications will remove any conflict with Petitioner's proposal to allot Channel 279C at Church Rock, New Mexico.

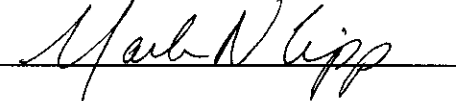
² A channel study for Channel 293C1 at Fredonia, Arizona is attached hereto as Attachment 4. The following alternate channels can also be allotted at Fredonia: 237, 238, 242, 258, 282, 283, and 294.

Respectfully submitted,

MARATHON MEDIA GROUP, LLC

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LLC

SKY MEDIA, LLC

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November 1, 2005

ATTACHMENT 1

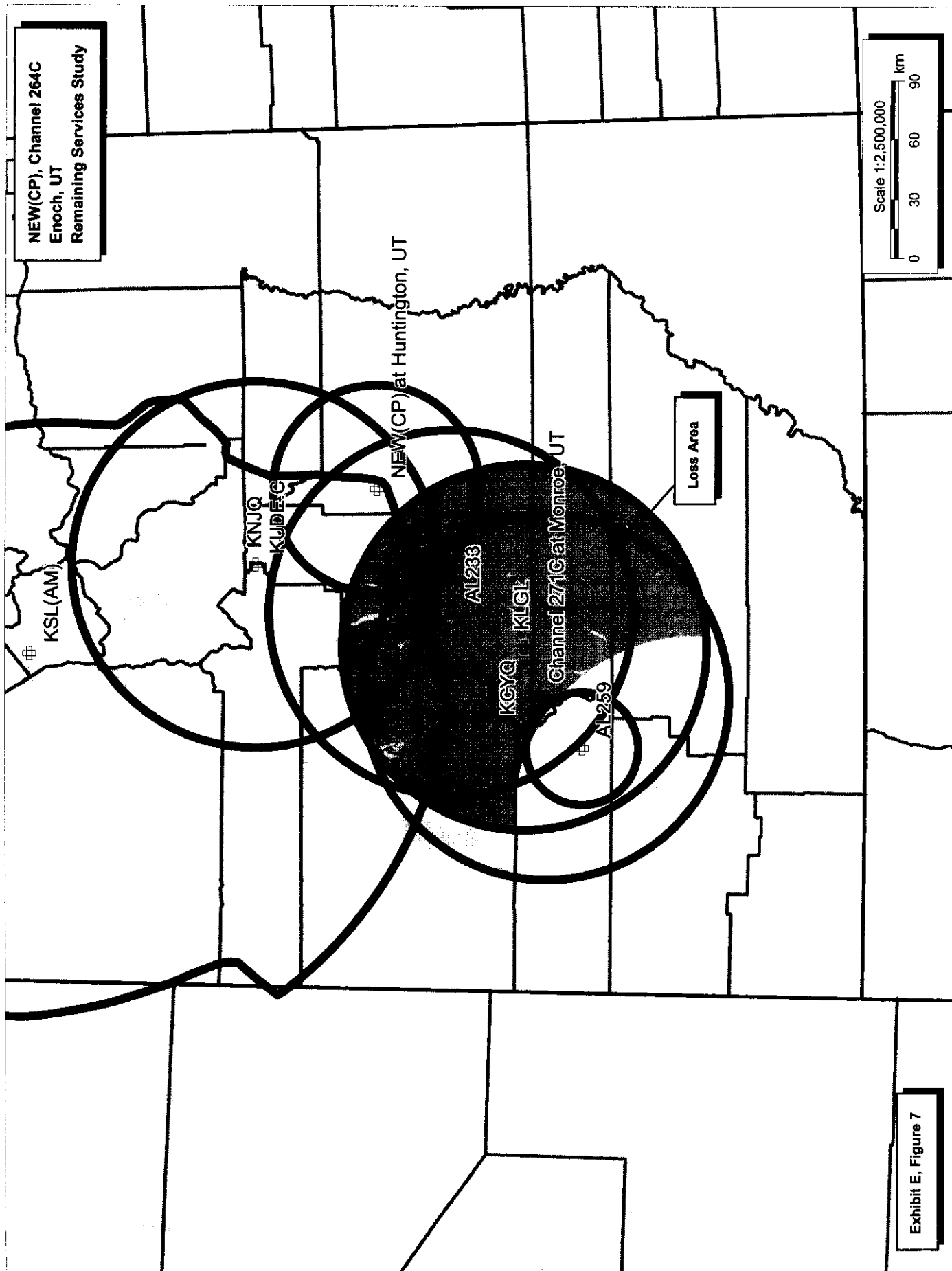


Exhibit E, Figure 7

ATTACHMENT 2

Engineering Statement

In Support of a
Counterproposal
The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 266C at Indian Springs, NV (KPLD)
Deleting Ch 266C at Kanab, UT and allotting Ch 266C to Indian Springs, NV
(Using COL modified Ch 266C allotment coordinates as reference)

REFERENCE		CLASS = C	DISPLAY DATES
36 37 24 N			DATA 11-01-05
115 58 19 W		Current Spacings	SEARCH 11-01-05
----- Channel 266 - 101.1 MHz -----			

Call	Channel	Location		Dist	Azi	FCC	Margin
KPKK.C	CP -N 266C	Amargosa Valley	NV	1.22	103.1	290.0	-288.78
KPKK	LIC 266C1	Amargosa Valley	NV	38.17	273.3	270.0	-231.83

Of concern:
Substitution of Ch 276C proposed
for KPKK at modified site

KPLD	LIC 266C	Kanab	UT	288.51	74.0	290.0	-1.49
KPLD.C	CP -N 266C	Kanab	UT	288.51	74.0	290.0	-1.49

Of no concern:
Licensed site of KPLD before proposed COL and site
Modification in instant counterproposal

KRRK	LIC-Z 266C0	Lake Havasu City	AZ	280.73	144.6	281.0	-0.27
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Of note:
Channel 266C0 deleted at Lake Havasu City and channel 266C
allocated at Spring Valley, AZ in a parallel counterproposal.

VAC.P	VAC 265B	Essex	CA	219.38	162.4	217.0	2.38
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Of note:
Substitution of Ch 265B for Ch 280B with
its allotment reference coordinates as reference.
Proposed substitution in a parallel counterproposal.

KKJJ	LIC 263C	Henderson	NV	110.40	128.0	105.0	5.40
KRAJ	LIC-N 265B1	Johannesburg	CA	200.95	231.2	193.0	7.95
KIXF	LIC 268B	Baker	CA	131.80	178.1	105.0	26.80
RADD	ADD 267A	Barstow	CA	213.63	206.6	165.0	48.63

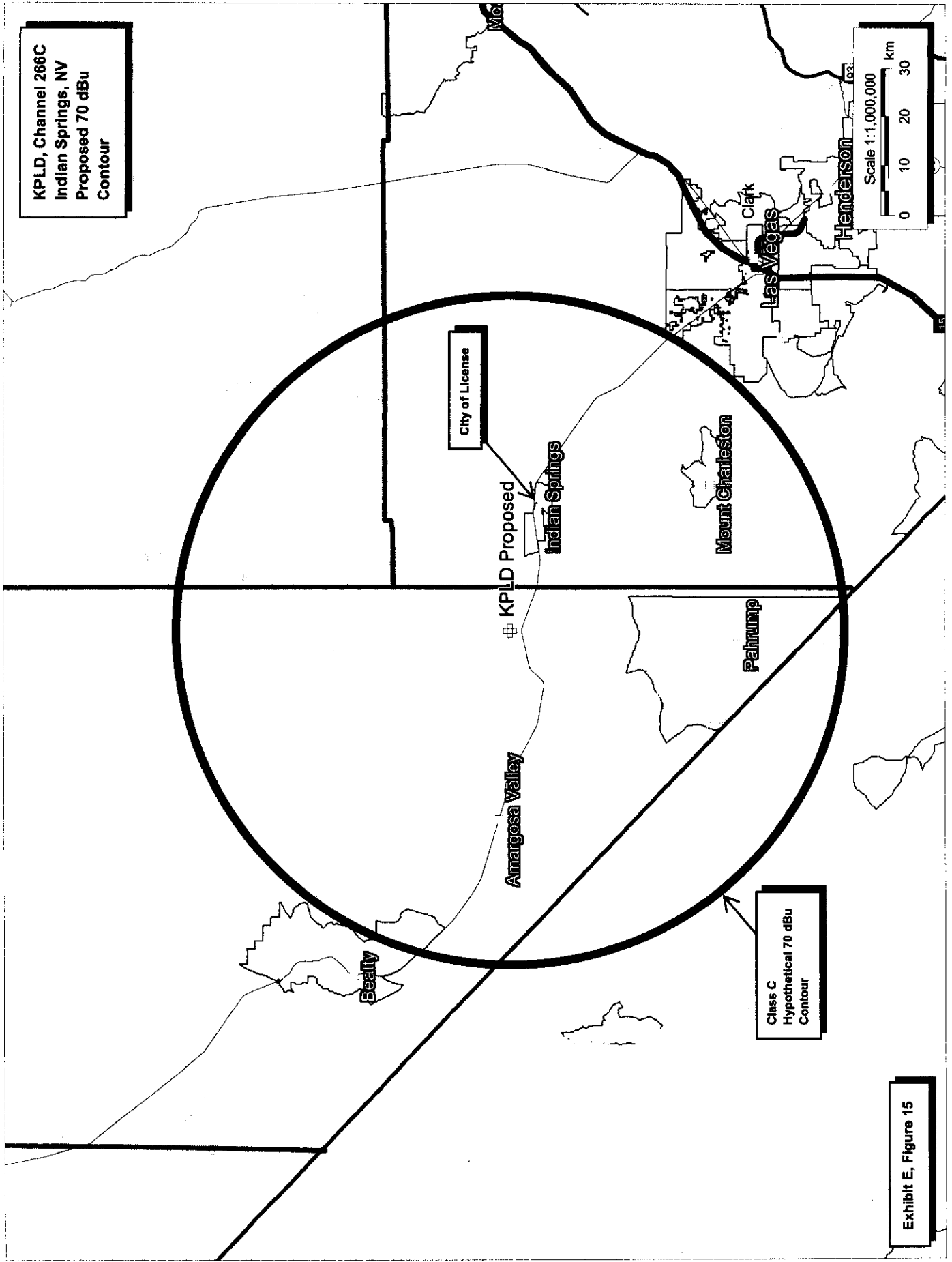
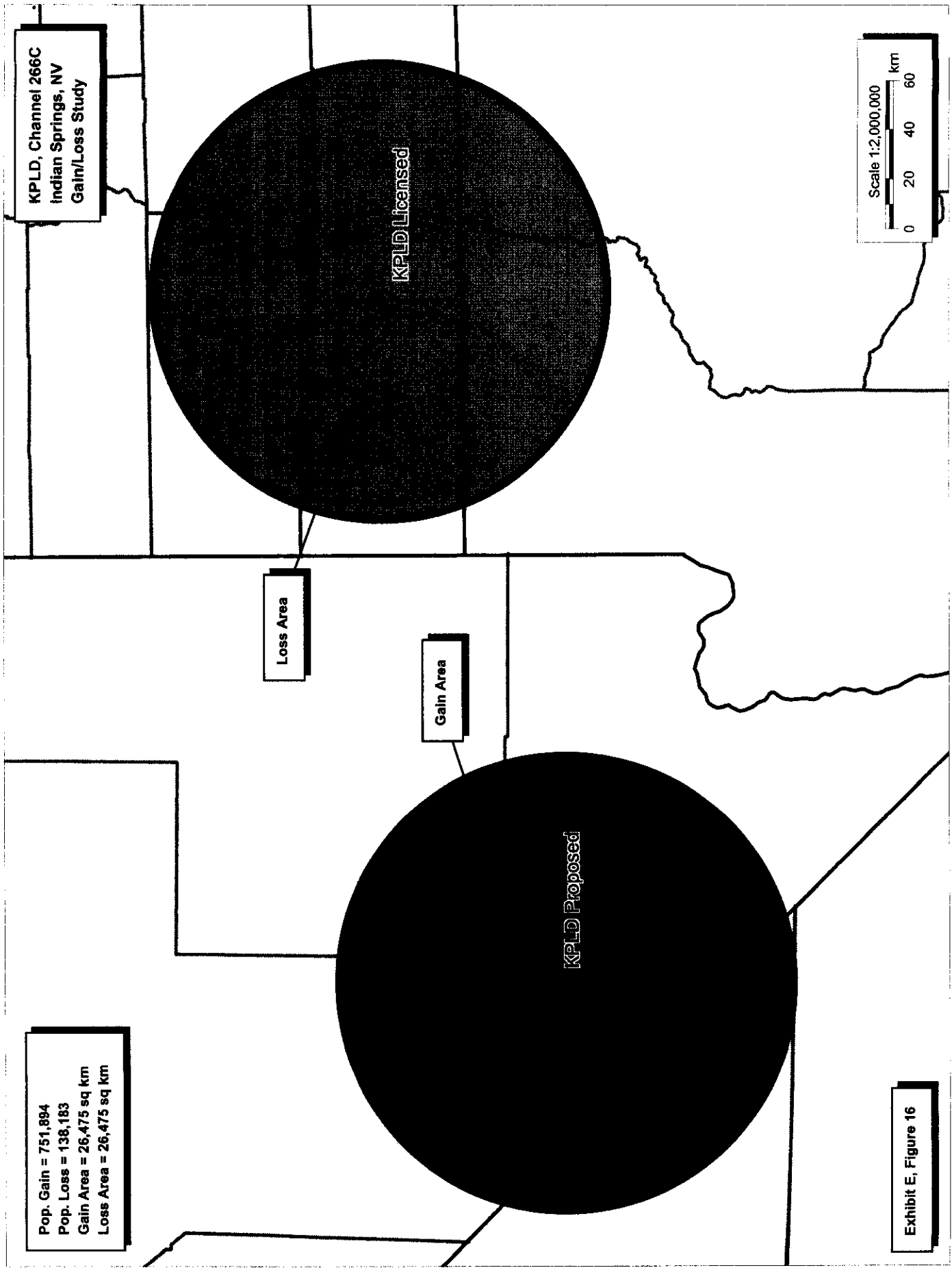


Exhibit E, Figure 15



ATTACHMENT 3

Engineering Statement

In Support of a
Counterproposal
The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 271C at Monroe, UT (New.C)
Allocating Ch 271C as replacement service for Ch 263C at Monroe, UT
(Using modified allotment coordinates as reference)

REFERENCE				CLASS = C		DISPLAY DATES		
38 23 10 N						DATA	10-31-05	
112 19 47 W				Current Spacings		SEARCH	10-31-05	
----- Channel 271 - 102.1 MHz -----								
Call	Channel	Location			Dist	Azi	FCC	Margin

Community of Monroe				UT	28.67	42.5		
Reference Coordinates:								
North Latitude: 38-37-46								
West Longitude: 112-07-13								
AL271	VAC	271C3	Castle Dale	UT	146.10	50.5	237.0	-90.90
NEW .C	CP	271C2	Castle Dale	UT	172.39	59.0	249.0	-76.61
Of Note:								
Authorized facility and COL before								
proposed deletion and allocation to Monroe								
KENZ	LIC	270C	Ogden	UT	252.63	2.5	241.0	11.63
KDUT	LIC	272C	Randolph	UT	298.74	22.0	241.0	57.74
KCLS.P	PRO	268C	Pioche	NV	204.49	255.2	105.0	99.49
Of Note:								
Allotment to Pioche for replacement								
signal for KBZB at;								
NL: 37-53-44, WL: 114-34-41								
KWID	LIC	270C	Las Vegas	NV	355.07	222.7	241.0	114.07
KVUW.C	CP	272C	Wendover	NV	359.22	328.5	241.0	118.22
KVUW	LIC	272A	Wendover	NV	299.83	331.4	165.0	134.83
KCLS.C	CP	269C3	Ely	NV	243.01	294.6	96.0	147.01
KCLS	RSV	269C3	Ely	NV	243.02	294.5	96.0	147.02
RDEL	DEL	269C3	Ely	NV	243.02	294.5	96.0	147.02
KSL-FM	LIC	274C	Midvale	UT	252.63	2.5	105.0	147.63
KCLS	LIC	269A	Ely	NV	243.02	294.5	95.0	148.02

Exhibit E, Figure 8

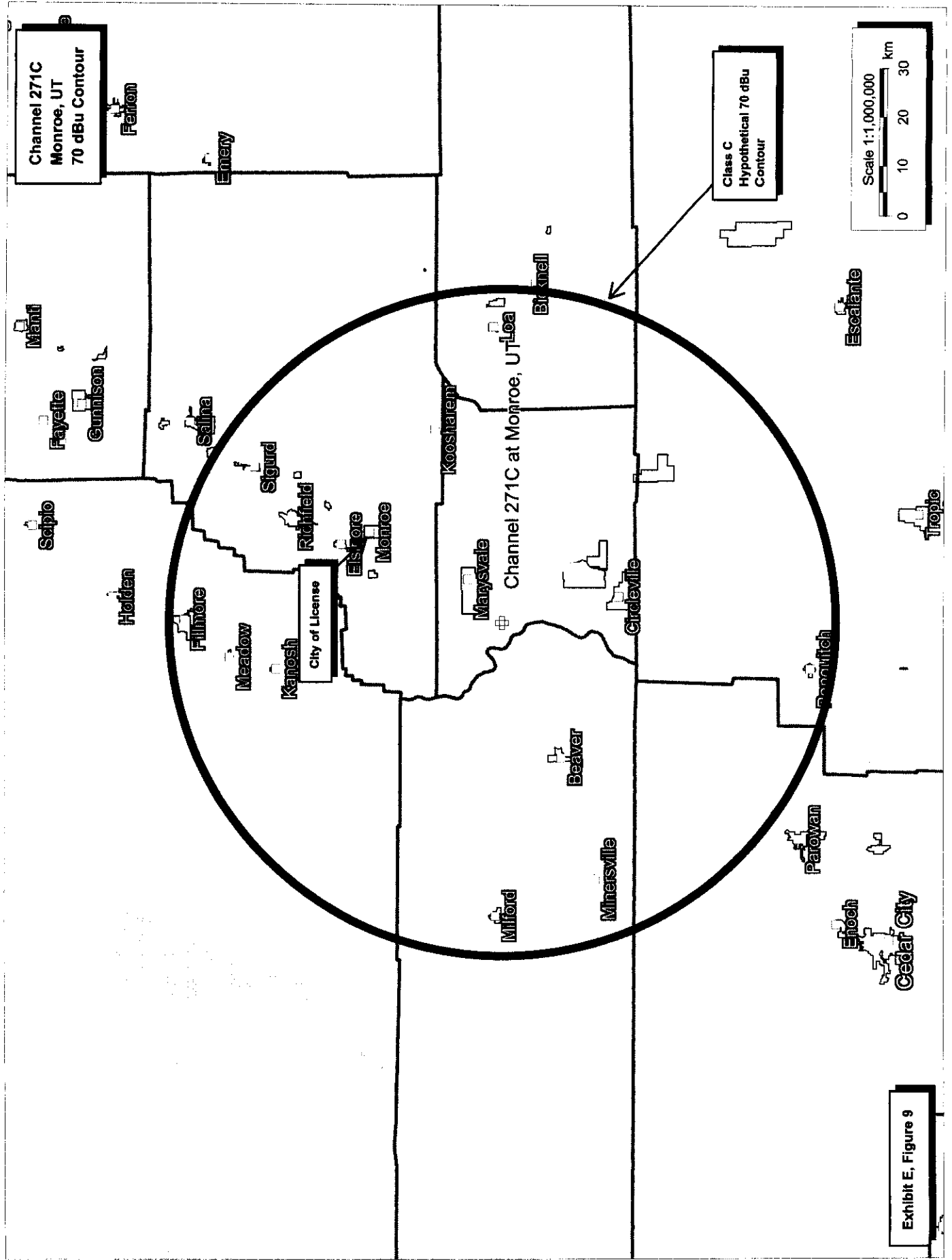
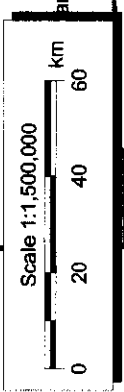


Exhibit E, Figure 9





NEW(CP), Channel 271C
Monroe, UT
Remaining Services Study



ATTACHMENT 4

Engineering Statement

In Support of a

Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 293C1 at Fredonia, AZ

Allocating Ch 293C1 as replacement service for Ch 278C1 at Fredonia, AZ

(Using current allotment coordinates as reference)

REFERENCE

36 53 00 N

CLASS = C1

DISPLAY DATES

DATA 11-01-05

112 11 40 W

Current Spacings

SEARCH 11-01-05

----- Channel 293 - 106.5 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
KSNEFM	LIC 293C	Las Vegas	NV 270.09	249.7	270.0	0.09
KSNEFM	APP 293C	Las Vegas	NV 270.13	249.7	270.0	0.13
AL291	RSV 291C2	St. George	UT 115.70	268.4	79.0	36.70
KSNN	LIC 291C2	St. George	UT 115.70	268.4	79.0	36.70

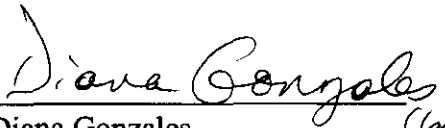
CERTIFICATE OF SERVICE

I, Diana Gonzales, a secretary in the law firm of Vinson & Elkins, do hereby certify that I have on this 1st day of November, 2005, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Reply Comments and Errata**" to the following:

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